

Document #S-1 Summary Comment #1

More than 650 commentors supported relocation of the tailings pile to an off-site location. Only a few of these commentors expressed a preference for a location; however, many of them offered at least one reason for wanting the tailings moved away from the Colorado River. Several of the commentors stated a preference to move the pile north of Moab to either Crescent Junction or Klondike Flats, and most of those said that their preferred transportation mode was rail. Some commentors stated that the White Mesa Mill site is an unacceptable location.

When a reason for relocation was provided, commentors typically identified one or more of the areas of uncertainties discussed in the EIS (Tables S-1 and 2-33) associated with on-site disposal as their reason(s) for preferring relocation. Fundamentally, they either challenged the validity of DOE's assumptions or found the consequences of the uncertainties to be unacceptable. Most of these commentors gave at least one of the following reasons for supporting relocation:

1. Potential for long-term threat to the quality of the surface water (local and downstream) used for drinking and recreational purposes if the tailings were capped in place.
2. Potential for river migration to erode the tailings pile, with subsequent adverse impacts to human health and the aquatic environment.
3. Potential for 100-year floods and Probable Maximum Floods (PMFs) to release additional contaminants to the river, with subsequent adverse impacts to human health and the aquatic environment.
4. Potential for future releases of contaminants from a suspected but unconfirmed ammonia salt layer within the pile.
5. Potential for seismic events that would release additional contamination to the Colorado River.
6. Potential for the engineered cover to fail.
7. Potential for future subsidence of the pile to river level, resulting in unacceptable impacts to surface water quality.
8. Greater costs in the long term if the tailings were left in place rather than relocated.
9. Visual and aesthetic concerns, which may detract from tourism.
10. The need to protect human health and the environment, no matter what the cost.

Many commentors who rejected the White Mesa Mill site as an off-site disposal location did so based on potential impacts to cultural resources, traditional cultural properties, environmental justice impacts, plants and animals, human health, and the potential for ground water contamination. In addition, many of these commentors expressed concern that the tailings pile was placed near the Colorado River in the first place or that DOE failed to take action sooner. Many also said that legislation passed in 2003 requires the tailings to be relocated.

Document #S-2 Summary Comment #2

Seven commentors supported relocation of the tailings to the White Mesa Mill site. The reasons given by these commentors fell into two general categories: the benefits to the local economy, and the ability of the site to reprocess or store the tailings safely.

S-3 Summary Comment #3

More than 50 commentors said that the environment needs to be protected, without specifying whether the tailings should be capped in place or relocated. For these commentors, the primary concern was the potential long-term threat to the quality of surface water (local and downstream) used for drinking and recreational purposes. Several also suggested isolating the tailings so that they would not affect the Colorado River.

S-4 Summary Comment #4

Eleven commentors supported implementing the on-site disposal alternative. The two primary reasons given for their support of this alternative were as follows:

- The risks of on-site disposal are not high enough to warrant the cost to relocate the tailings.
- The on-site disposal alternative can be implemented in a manner that is protective of ground water and surface water.

S-5 Summary Comment #5

More than 640 individuals sent the following comment by electronic mail (e-mail):

“I urge you to revise or re-issue the Environmental Impact Statement (EIS) for the final reclamation of 12 million tons of uranium wastes that are contaminating the Colorado River near Moab, Utah. The final EIS should abandon the alternative of capping the radioactive waste at its current site on the bank of the Colorado River, and should instead identify a preferred alternative of moving the waste to one of two nearby Utah sites - Klondike or Crescent Junction.

“It is not acceptable to leave 12 million tons of mill wastes leaking into the Colorado River, directly in the path of a major flood. The radioactive wastes are now located in an unlined pile within the floodplain of the river and are leaking approximately 12,000-15,000 gallons per day of intensely contaminated fluids into an underground aquifer that immediately discharges into the river.

“The Klondike and Crescent Junction sites are in extremely stable, isolated areas that meet all the criteria for long-term disposal of radioactive wastes. The present location, on the other hand, fails every test for an appropriate site, since it does not provide long-term isolation from the human and natural environment below ground that will endure without the need for ongoing maintenance.

“Every possible savings from capping in place is offset by a huge risk of tailings failure. The decision to remove these mill wastes from the bank of the river is long overdue. I urge the Department of Energy to move the tailings pile away from the banks of the Colorado River to one of two sites identified above.

“Thank you for your consideration.”

S-6 Summary Comment #6

More than 100 individuals sent the following comment by e-mail:

“I am writing to urge your Department to recommend removing all of the radioactive waste from the floodplain of the Colorado River near Moab, Utah as soon as possible. Congress has directed your agency to protect the river and downstream communities from the threat posed by 12 million tons of radioactive waste at the Atlas Mill site. Your department has already overseen the cleanup of a number of smaller and less dangerous uranium mill sites. I am very concerned about statements in the press suggesting that your department may choose to leave this ticking time bomb on the banks of the river because it would cost less than moving the material to a safer location.

“The massive pile of radioactive waste is very unstable and is less than half a mile from the river that provides water for 25 million Americans. The site pollutes the river now, floods with some regularity, and is in an area with a history of seismic activity.

“Secretary Abraham, this is no time to cut corners. The Colorado River is too precious and too many people depend on it to allow cleanup cost and the hope of containment to dictate your department’s choice of action. Please direct your staff to recommend a full and immediate cleanup of the Atlas Mill site along the Colorado River.

“Thank you for your consideration of my comments.”